



10 December 2014

Discussion Paper - AUSTRAC industry contribution
AUSTRAC Legal and Policy Branch
PO Box 13173, Law Courts
MELBOURNE VIC 8010

Sent by email to Policy_Consultation@austrac.gov.au

Dear sir/madam,

**RE: AUSTRAC INDUSTRY CONTRIBUTION –THIRD STAKEHOLDER
CONSULTATION DISCUSSION PAPER**

BetSafe has been involved with the development of AML/CTF compliance programs for over 50 NSW and ACT clubs and hotels. All of these clubs and hotels receive some revenue from gaming machines and are therefore subject to the AUSTRAC supervisory regime.

At present, none of these clubs have annual earnings of \$100 million or more. However, it is possible that some clubs and other gaming venues could become subject to the regime of charges unless the \$100 million threshold is linked to inflation.

We note that the earnings component levy is calculated at the rate of 0.05 percent, which would be \$50,000 for earnings of \$100 million.

We recommend that the earnings component levy be:

- a) adjusted annually for changes in the prevailing rate of inflation to avoid bracket creep; and
- b) applicable only to those earnings that exceed \$100 million threshold amount, rather than applicable to all earnings of entities that have earnings greater than \$100 million.

This would prevent a significant jump in contributions for those entities that have earnings that grow in line with inflation or just exceed the threshold amount.

Yours faithfully,
BETSAFE PTY LTD

DANIEL SYMOND
MANAGER